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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|--|
| UNITED STATES OF AMERICA, |) | NO. 3:2-CR-00210-SI |
| |) | |
| Plaintiff, |) | STIPULATION TO EXCLUDE TIME FROM JUNE |
| |) | 24, 2022 TO AUGUST 26, 2022 AND [PROPOSED] |
| v. |) | ORDER |
| |) | |
| CHRISTOPHER WAGNER, |) | |
| |) | |
| Defendant. |) | |

It is hereby stipulated by and between counsel for the United States and counsel for the defendant CHRISTOPHER WAGNER, that time be excluded under the Speedy Trial Act from June 24, 2022, through August 26, 2022.

At the status conference held on June 24, 2022, the government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced, and finalize the plea agreement. For these reasons and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until August 26, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from June 24, 2022, through August 26, 2022, from computation under the Speedy

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
Case No. 3:22-CR-210-SI

1 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C.
2 § 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation and proposed order.

5
6 IT IS SO STIPULATED.

7 DATED: June 24, 2022

/s/
CHRISTA HALL
Assistant United States Attorney

9 DATED: June 24, 2022

/s/
DANIEL BLANK
Counsel for Defendant WAGNER

11
12 **[PROPOSED] ORDER**

13 Based upon the facts set forth in the stipulation of the parties and the representations made to the
14 Court on June 24, 2022 and for good cause shown, the Court finds that failing to exclude the time from
15 June 24, 2022, through August 26, 2022 would unreasonably deny defense counsel and the defendant
16 the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
17 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the
18 time from June 24, 2022, through August 26, 2022 from computation under the Speedy Trial Act
19 outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the
20 consent of the parties, IT IS HEREBY ORDERED that the time from June 24, 2022, through August 26,
21 2022, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A),
22 (B)(iv).

23 IT IS SO ORDERED.

24
25 DATED: _____

HON. SUSAN ILLSTON
United States District Judge